ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
REGULATORY CONTACT RECORD

Date/Time: March 26, 2002/ 12:45 pm

Site Contact(s): Carolyn Hicks
Phone: 303-966-5773

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

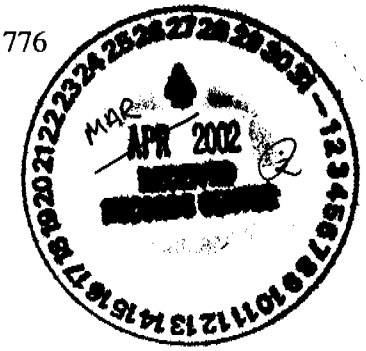
Purpose of Contact: Request approval to start D&D operations for Set 78 in B776/777

Discussion
Mr. Hindman has completed his review of draft B776/777 DOP Modification #8. His comments have been incorporated, and he has approved the revised closure information sheets. A revised Modification #8 will be re-submitted to DOE for transmittal to CDPHE. Mr. Hindman has granted permission to proceed with D&D of Set 78 (overhead RCRA piping) per the attached closure information sheet while Modification #8 is being revised and approved.

Contact Record Prepared by: Carolyn Hicks

Distribution:

R. DiSalvo, RFFO
S. MacLeod, RFFO
J. Legare, RFFO
G. Schuetz, RFFO
N. Newell, CDPHE
S. Gunderson, CDPHE
E. Kray, CDPHE
J. Hindman, CDPHE
T. Rehder, USEPA
P. Arnold, K-H 371
J. Berardini, K-H MS
C. Deck, K-H
C. Gilbreath, K-H 771
G. Scott, K-H
D. Shelton, K-H
K. North, K-H ESS
A. Rosenman, K-H ESS
D. Johnson, K-H ESS
J. Mead, K-H ESS
T. Hopkins, K-H 776
S. Nesta, K-H RISS
J. Dischinger, RFCSS
W. Simpson, 776
W. Sproles, 776
M. Crocker, 776
M. Johnson, 776
S. Dahlgren, 776
M. Ferri, 776
M. Heser, K-H ESS
E. Blush, 776
N. Holmes, 776
J. Lehew, 776
A. Digiallonardo, 776



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Appendix H
B776/777 Closure Project
RCRA Unit Closure Information Sheet

SET #	RCRA Unit #(s)	Description	Regulatory Status	Closure Status
78	Various – see description below	Overhead RCRA piping above 8 feet	Mixed residue, permitted	T-tanks active All others inactive

Unit Description:	SET 78 includes overhead piping above approximately 8 feet that will remain after removal of tank and glovebox sets. This set includes piping ancillary to the following RCRA tank systems: Tanks T-1, T-2; Units 95.015, 95.016; tanks removed with Set 26. Tank T-7, Unit 95.014, tank removed with Set 11. Tanks 1103, 1104, 1106; Units 95.006, 95.007, 95.008; tanks removed with Set 7. Tanks T-1A, T-1B, T-2A, T-2B ("T-Tanks"); Unit 776.2; tanks to be removed with Set 69. Tanks SR-3, SR-4, SR-5; Units 94.001, 94.002, 94.003; tanks removed with Set 55. Ball mill washer, annular tank, and collection pan in Size Reduction Vault (SRV); Units 94.009, 94.010, 94.011; tanks are physically empty and will be removed with Set 60. Tanks T-344, T-345; Units 94.005, 94.006; tanks are physically empty and will be removed with Set 66. Reverse flow line; ancillary to Unit 774.3B; process waste piping from Building 774 that passes through Building 776 but does not connect to B776 waste lines. The concrete floor of the building provides secondary containment for the ancillary piping.
Unit Boundaries and Interfaces:	A drawing is attached (Plate 1) showing the piping covered in Set 78. The drawing also shows some non-regulated piping for clarification, as many non-regulated lines are marked as "process waste" in the building. The aqueous process waste lines (reverse flow line and T-tank line to Building 374) will be removed from the south end of the 771 tunnel (where the two lines enter the 776 elevator basement) through Building 776 and 778, and the lines will be capped where they exit Building 778 leading to valve vault 9. Although Building 778 is included in the Building 707 DOP, the process waste lines will be closed under the Building 776 DOP. The machine coolant/solvent waste line and trichloroethane waste line entering Building 777 from Building 707 will be cut and capped at the boundary between Buildings 777 and 778 hallway. The machine coolant/solvent waste line exiting the north side of Building 776 going toward Building 774 will be cut and capped at a logical point between the buildings mutually agreed upon between the two closure projects. The concrete floor that serves as secondary containment in Buildings 776 and 777will be addressed with Set 82, Building Structure.
EPA Waste Codes/ Waste	The piping associated with mixed residue tanks T-1, T-2, T-7, 1103, 1104, and 1106 contained waste oils and/or solvents, and will be characterized with EPA codes F001 and

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Characterization:	F002. Piping associated with the T-tanks, including the feed line from Building 779 and the outlet line to Building 374, transferred only characteristic hazardous waste for several years, although historically they were permitted for F-listed waste codes. The 776 Closure Project may elect to demonstrate that the F-listed wastes are no longer contained in the T-tank system, in conjunction with characterization efforts for the site-wide process waste system (e.g. B374 sludge de-listing petition). This characterization will also be applied to the reverse flow line from Building 774. The outlet lines from Tanks T-344, T-345, T-360, and T-370 will be managed with EPA waste codes F001 and F002, consistent with the tank characterization (refer to closure plans for Sets 52 and 66). The outlet lines from the ball mill washer system in the SRV and Tanks SR-3, SR-4, and SR-5 leading to the T-tanks will be managed as non-hazardous LLW at closure, based on characterization of the ball mill sludge as non-hazardous. (Refer to closure plan for Set 60.)
Selected Closure Option:	Closure by removal. Optionally the piping may be washed, rinsed and sampled or cleaned to meet debris rule standards prior to removal.
Closure Activities:	Closure activities for the piping include draining any residual liquids or sludges, removal, size reduction, and packaging of waste. Optional closure activities include flushing/washing the piping with a solution capable of removing the contaminants of concern followed by rinsing and sampling, or debris rule cleaning followed by closure by removal.
Waste Disposal:	The piping and secondary waste (e.g., PPE and plastic containment material) generated during closure activities will be managed as CERCLA remediation waste. Hazardous liquids and sludges, if any, drained from mixed residue systems will be managed as RCRA wastes. Absorbent will be added to waste packages with items that could contain residual liquids or sludges. Upon final radiological characterization, the waste will be packaged and managed in accordance with waste management requirements in Section 6 of the DOP.